

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

RUSSELL HANKERSON

Defendant.

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Criminal No: 1:20-CR-10136-RGS-15

MOTION TO AMEND CONDITIONS OF RELEASE

NOW COMES the Defendant, Russell Hankerson, by and through his attorney, Paul Garrity, and moves this Court to amend his conditions of release to allow the Defendant to stay overnight at aunt's home from September 4, 2021 to September 5, 2021.

In support of this motion, the Defendant states as follows:

1. The Defendant currently has a curfew from 11:00 p.m. to 7:00 a.m.
2. The Defendant's aunt, Rowena Golay, has requested that the Defendant stay overnight from September 4, 2021 through September 5, 2021 at her residence, 11 Orrin White Drive, Randolph, MA.
3. Probation Officer Erin Hennemann has been contacted regarding this motion and takes no position to the Defendant's request but will leave the matter up to the Court. USPO Hennemann also stated that the undersigned counsel may inform the court that the Defendant has been in compliance with location monitoring and conditions since the filing of USPO Hennemann's petition.
4. Assistant US Attorney Timothy Moran has been contacted and does not assent to the Defendant's request.

WHEREFORE the Defendant respectfully requests that this Honorable Court grant the within motion and amend his conditions to allow the Defendant to stay overnight at his aunt's home from September 4, 2021 to September 5, 2021.

Respectfully submitted
Russell Hankerson,
By his Attorney,

Date: September 2, 2021

/s/ Paul J. Garrity_____
Paul J. Garrity
Bar No. 555976
14 Londonderry Road
Londonderry, NH 03053
603-434-4106

CERTIFICATE OF SERVICE

I, Paul J. Garrity, herein certify that on this 2nd day of September, 2021, a copy of the within Motion was e-filed for all parties involved and mailed, postage pre-paid, to Russell Hankerson.

Date: September 2, 2021

/s/ Paul J. Garrity_____
Paul J. Garrity